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Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Adv. Pro No. 10-04428 (SMB)

Plaintiff,

v.

THE ESTATE OF ALLEN MEISELS, PEGGY A.
MEISELS, in her capacity as Executrix of the Estate
of Allen Meisels, and DAVID T. MULDBERG, in
his capacity as Executor of the Estate of Allen
Meisels,

Defendants.

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANTS'
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of Chaitman LLP, counsel for Defendants the Estate of Allen Meisels, Peggy A. Meisels in her capacity as Executrix of the Estate of Allen Meisels, and David T. Muldberg, in his capacity as Executor of the Estate of Allen Meisels (collectively, "Defendants"), and am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this Declaration in support of Defendants' motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated November 30, 2010.

4. Attached hereto as **Exhibit B** is a true and accurate copy of Meisels' Answer and Affirmative Defenses, dated August 13, 2015.

Dated: New York, New York
February 7, 2020

/s/ Helen Davis Chaitman
Helen Davis Chaitman